

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

Dashon Hines )  
Plaintiff(s) )  
 )  
vs. )  
Verizon Wireless Communications )  
Defendant(s) )

Civil Case No.:

CIVIL  
RIGHTS  
COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

Plaintiff(s) demand(s) a trial by: ☐ JURY ☒ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: Dashon Hines  
Address: 124 Fulton Street #5C  
Buffalo New York 14204

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Verizon Wireless Communications  
Official Position: Telecommunications Corporation  
Address: One Verizon Way  
Basking Ridge NJ 07920

b. Defendant: \_\_\_\_\_  
Official Position: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. Defendant: \_\_\_\_\_  
Official Position: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Defendants may be added on a separate sheet of paper.

4. **FACTS**

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

**Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).**

On May 3, 2023, Verizon Communications Corporation issued a bill to the plaintiff in violation of 42 U.S.C. sect. 1983. The plaintiff was <sup>PH</sup> ~~entered~~ into an agreement with the defendant under the false pretense that he was at a place of business under Verizon Wireless Communications located 6050 South Park Avenue, Suite 100, Hamburg New York 14075. However, the "place

of business was closed. Verizon Wireless Communications does not ~~at~~ conduct business at the Hamburg New York location and ~~to~~ the plaintiff was not free to move and/or leave the abandoned building until he was robbed by "Verizon Staff" for every amount of United States Money on his person. While held against his will - the plaintiff surrendered his personal ~~ident~~ identity, identity information, his person, and wallet containing his personal funds.

5.

**CAUSES OF ACTION**

**Note: You must clearly state each cause of action you assert in this lawsuit.**

**FIRST CAUSE OF ACTION**

Verizon Wireless Communication unlawfully detained, robbed, and ~~extorted~~<sup>(D7)</sup> extorted the Plaintiff for U.S. funds under the false pretense that he was doing business with a company in operation in Hamburg New York.

**SECOND CAUSE OF ACTION**

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**THIRD CAUSE OF ACTION**

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6. **PRAYER FOR RELIEF**

**WHEREFORE**, plaintiff(s) request(s) that this Court grant the following relief:

\$1,000,000.00 (One Million Dollars)

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I declare under penalty of perjury that the foregoing is true and correct.

DATED:

May 3, 2023

Dashon Hines  
Dashon Hines

Signature of Plaintiff(s)  
(all Plaintiffs must sign)

02/2010

MEMORANDUM OF LAW

Account: 289847311-00001

Invoice: 4492311635

Billing period: First Bill

Questions about your bill?

verizon.com/support

800-922-0204

Ways to pay



My Verizon app

You can download the My Verizon app at [go.vzw.com/mva](http://go.vzw.com/mva) in both the App Store and Google Play.



Online

Go to [www.verizon.com/expresspay](http://www.verizon.com/expresspay) and sign in to My Verizon to pay your bill.



By phone

Simply dial #PMT (#768) on your phone and follow the instructions to pay.



Cash

Go to [www.verizon.com/stores](http://www.verizon.com/stores) to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment.

We updated the design of your bill.

Learn more about these updates at [verizon.com/billupdates](http://verizon.com/billupdates)



DASHON HINES  
124 FULTON ST  
APT MY UN  
BUFFALO, NY 14204-2239

00004306  
UV

Heads up, your first bill is usually higher due to one-time new account charges and activation fees.

Snapshot of your bill

(details on page 3)

Balance from last bill \$0.00

This month's charges \$159.90

Total due on May 11 \$159.90

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance (whichever is greater), or as allowed by law in the state of your billing address.

verizon

DASHON HINES  
124 FULTON ST  
APT MY UN  
BUFFALO, NY 14204-2239

Bill date  
Account number  
Invoice number

First Bill  
289847311-00001  
4492311635

Total Amount Due by May 11, 2023

Make check payable to Verizon Wireless.  
Please return this remit slip with payment.

\$159.90

\$    .

Please see back for instructions on writing to us.

P.O. BOX 408  
NEWARK, NJ 07101-0408



44923116350102898473110000100000015990000000159907

Account: 289847311-00001

Invoice: 4492311635

Billing period: First Bill

## Questions about paying your bill?

Go to [go.vzw.com/support/pay-bill-faqs](http://go.vzw.com/support/pay-bill-faqs) to learn more.

## Address change:

Change your address at [go.vzw.com/changeaddress](http://go.vzw.com/changeaddress).

## Important Information:

Many billing questions can be resolved easily online or with the My Verizon App. Customer service can also assist you by phone, chat or in a retail store for billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to this below address:

Verizon  
Attn: Correspondence Team  
PO Box 15069  
Albany, NY 12212

Select a checkbox that describes how we can help you along with any additional information and include it with your written correspondence.

### Automatic Payment Enrollment for Account: 289847311-00001 DASHON HINES

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

1. Check this box.
2. Sign name in box below, as shown on the bill and date.
3. Return this slip with your payment. Do not send a voided check.

Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)





# Your April bill is \$159.90

Due May 11

Account: 289847311-00001

Invoice: 4492311635

Billing period: First Bill

## Questions about your bill?

verizon.com/support

800-922-0204

## On your first bill



You saved \$15.34 with discounts.

## Bill summary

One-time charges	\$35.00
Plans	\$100.00
Devices	\$10.21
Surcharges	\$8.81
Taxes & gov fees	\$5.88
<b>Total:</b>	<b>\$159.90</b>

## Review bill details



### My Verizon app

You can check your bill easily with the My Verizon app. Download the app at govzw.com/mva in both the App Store and Google Play.



### Online

Go to govzw.com/mybill and sign in to My Verizon to review your bill.

### Surcharges, taxes and gov fees

The total amount due for this month includes surcharges of \$8.81 and taxes and gov fees of \$5.88. For an itemized list of taxes, fees and surcharges visit go.vzw.com/mybill.

### Save up to \$10.00/month when you enroll in Auto Pay & paper-free billing.

The discount will be effective beginning your next billing cycle after the enrollment.



**Account:** 289847311-00001

**Invoice:** 4492311635

**Billing period:** First Bill

## Charges by line summary

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**Dashon Hines** **\$159.90**

Smartphone

716-225-4183

- ☒ New plan added
  - ☒ New device added
- 

**Total:** **\$159.90**

**Save up to \$10.00/month when you enroll in Auto Pay & paper-free billing.**

The discount will be effective beginning your next billing cycle after the enrollment.

0-1  
46571494.2  
00004306



**Account:** 289847311-00001

**Invoice:** 4492311635

**Billing period:** First Bill

## Charges by line details

### Dashon Hines \$159.90

Smartphone  
716-225-4183

- ✓ New plan added
- ✓ New device added

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### One-time charges & credits \$35.00

Activation fee \$35.00

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### Plan(s) \$100.00

5G Get More \$100.00  
Apr 20 - May 19

Save \$10 on your 5G GET MORE plan each month when you enroll in Auto Pay (using bank account or debit card) and paper-free billing. Enroll using the My Verizon app, or at [vzw.com/myverizon](http://vzw.com/myverizon).

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### Devices \$10.21

IPHONE 14 PLUS 128 MIDNIGHT \$25.55  
Payment 1 of 36(\$884.45 remaining)  
Agreement 1781787143

Device Promotional Credit -\$15.34  
Credit 1 of 36

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### Surcharges \$8.81

Fed Universal Service Charge \$3.96  
Regulatory Charge \$0.09  
Admin & Telco Recovery Charge \$3.30  
Gross Receipts Surchg \$1.46

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### Taxes & gov fees \$5.88

NY Public Safety Comm Surchg \$1.20  
NY Local Pub Safety Com Surchg \$0.30  
NY State Sales Tax-Telecom \$2.00  
Erie Cnty Sales Tax-Telecom \$2.38

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### Shared account charges \$0.00



Account: 289847311-00001

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## Additional information

### Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit [Verizon.com](http://Verizon.com) for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at [vzw.com/myprivacy](http://vzw.com/myprivacy).

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

### Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including:

- (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs;
- (b) property taxes; and
- (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

**Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.**

### Returned Payments

If you pay your wireless bill by check and your check is returned by your bank for insufficient funds, Verizon Wireless may resubmit your check to your bank for payment from your checking account.

### Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

### Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on [go.vzw.com/changeaddress](http://go.vzw.com/changeaddress).

### More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are \$159.90.

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were \$100.00 (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: \$5.31 for voice, \$1.37 for messaging, \$87.33 for data, and \$5.99 for other services.

For more information, please go to [vzw.com/taxesandsurcharges](http://vzw.com/taxesandsurcharges).

### Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

COLR700A 1154 5011 125 07 20230422 PG 3 OF 4  
9-1  
00004306 46571496.2



**Account:** 289847311-00001

**Invoice:** 4492311635

**Billing period:** First Bill

## Additional information continued

### Device Payment Schedule

Listed below are the dates of your future payments for device payment agreement 1781787143.

#### Schedule Of Future Payments Due

Payment 1: May 11, 2023  
 Payment 2: June 11, 2023  
 Payment 3: July 11, 2023  
 Payment 4: August 11, 2023  
 Payment 5: September 11, 2023  
 Payment 6: October 11, 2023  
 Payment 7: November 11, 2023  
 Payment 8: December 11, 2023  
 Payment 9: January 11, 2024  
 Payment 10: February 11, 2024  
 Payment 11: March 11, 2024  
 Payment 12: April 11, 2024  
 Payment 13: May 11, 2024  
 Payment 14: June 11, 2024  
 Payment 15: July 11, 2024  
 Payment 16: August 11, 2024  
 Payment 17: September 11, 2024  
 Payment 18: October 11, 2024  
 Payment 19: November 11, 2024  
 Payment 20: December 11, 2024  
 Payment 21: January 11, 2025  
 Payment 22: February 11, 2025  
 Payment 23: March 11, 2025  
 Payment 24: April 11, 2025  
 Payment 25: May 11, 2025  
 Payment 26: June 11, 2025  
 Payment 27: July 11, 2025  
 Payment 28: August 11, 2025  
 Payment 29: September 11, 2025  
 Payment 30: October 11, 2025  
 Payment 31: November 11, 2025  
 Payment 32: December 11, 2025  
 Payment 33: January 11, 2026  
 Payment 34: February 11, 2026  
 Payment 35: March 11, 2026  
 Payment 36: April 11, 2026

### You have choices about the use of your Information in Verizon Wireless programs

(1) Custom Experience and Custom Experience Plus

The Verizon Custom Experience program uses information about websites you visit and apps you use on your mobile device to help us personalize our communications with you, give you more relevant product and service recommendations, and develop plans, services, and offers that are more appealing to you.

The Verizon Custom Experience Plus program uses a broader set of information for the same purposes including information about websites and apps you use, your Verizon Fios services, location information, and Customer Proprietary Network Information, including phone numbers you call or those that call you.

The information in the Custom Experience programs is used only by Verizon. We do not use the information for third-party targeted advertising or provide the information to others for them to use for their own advertising.

Your choices:

- Your new line(s) will be included in the Custom Experience program unless you opt-out.
- You will need to opt in to the Custom Experience Plus program to be included.

- You can view and change your choices at any time using privacy settings on the My Verizon site or app.

Eligibility:

Consumer and small business customers with smartphone lines are included in the Custom Experience program, except for lines with devices or plans meant for children and lines associated with Maine customers. This program does not include lines sold to corporate and government accounts and lines with tablets, basic phones, or mobile hotspots.

Consumer and small business customers may opt in to the Custom Experience Plus program. This program does not include lines sold to corporate and government accounts and lines with devices or plans meant for children.



**Account:** 289847311-00001

**Invoice:** 4492311635

**Billing period:** First Bill

## Additional information continued

For more information, view our FAQs:  
<https://m.vzw.com/ce-faqs>

### (2) Business and Marketing Insights

The Business and Marketing Insights program helps us and others better understand consumer actions in aggregate. For example, we may create insights about the number of customers in different age groups who visit a website, use an app, or go to a retail store or stadium. We also can develop insights to help estimate traffic patterns about people who move from one area to another during the morning rush hour. The information we use and the insights we create do not identify you individually.

This program uses information about websites you visit and apps you use on your mobile device, device location, certain information about your Verizon products and services (such as device type, and amount of use) and demographic and interest information we get from you or from other companies (such as gender, age range and interests). We also use location and point of interest information we obtain from others and information provided by business and marketing insights clients who want to better understand their own customers or businesses.

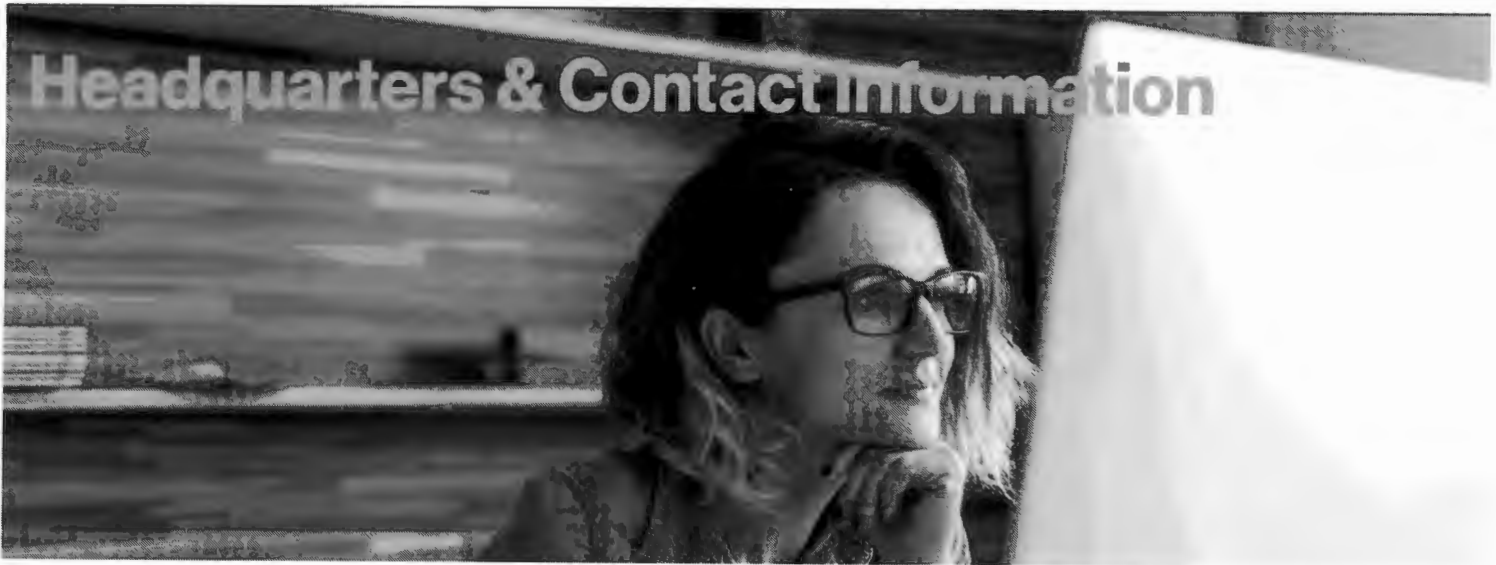
#### Your choices:

You can opt out of participating in the Business and Marketing Insights program and can change your choices at any time using privacy settings on the My Verizon site or app or by calling 866.211.0874.

For more information and instructions for opting out, visit our FAQs: [go.vzw.com/BMI-FAQS](https://go.vzw.com/BMI-FAQS)

## FUSC Change

The Federal Universal Service Charge (FUSC) is a Verizon Wireless charge that is subject to change each calendar quarter based on contribution rates prescribed by the FCC. On April 1, the FUSC decreased to 8.73% of assessable wireless charges, other than separately billed interstate and international telecom charges. The FUSC on separately billed interstate and international telecom charges decreased to 29%. For more details, please call 1-888-684-1888.



Our official headquarters and Board of Directors are located in New York City. However, our executive leadership and corporate functions are located in Basking Ridge, New Jersey.

## New York Corporate Headquarters

1095 Avenue of the  
Americas, New York,  
NY 10036, USA  
212-395-1000

**View on  
map**

**Get  
directions**

One Verizon Way,  
Basking Ridge, New  
Jersey 07920, USA  
908-559-2001

**View on  
map**

**Get  
directions**



## Contact Information

**Media Relations**

**Investor Relations**

**Verizon Foundation Community Relations**

**Customer Service**

**Business Sales**

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## **Other Locations & Maps**

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**Other Office Locations**

**Find a Verizon Store**

**5G & 4G LTE Coverage Map**

**Smart Cities Map**

**Services & Solutions**

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VerizonGreen

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# Verizon's Executive Leadership



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## Chairman and Chief Executive Officer

Hans Vestberg is chairman and chief executive officer of Verizon, the world's largest wireless, fiber-optic and global information networks and ...

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**Photo:**

**Follow:**



## **Sowmyanarayan Sampath (Sampath)**

**Executive Vice President and CEO Verizon Consumer Group**

[View Bio](#)



**Kyle Malady**

**Executive Vice President and CEO Verizon Business Group**



**Craig Silliman**

**Executive Vice President and President of Verizon Global Services**





**Samantha Hammock**

**Executive Vice President and Chief Human Resources Officer**

**View Bio**



**James J. Gerace**

**View Bio**



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## **Chief Corporate Social Responsibility Officer**

[View Bio](#)



## **Rima Qureshi**

**Executive Vice President and Chief Strategy Officer**

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**Joe Russo**

**Executive Vice President & President of Global Networks and Technology**



**Diego Scotti**

**Executive Vice President and Chief Marketing Officer**



**Tony Skiadas**

**Executive Vice President & Chief Financial Officer**

[View Bio](#)



**Vandana Venkatesh**

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[View Bio](#)

## Board of Directors

The board of Directors is charged with maintaining the highest standards of corporate governance because it believes that an effective board will positively influence shareholder value and enhance Verizon's reputation.

[View board of directors](#)

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**Services & Solutions**

**Support**

**Network Technologies**

**Innovation**



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Important Consumer Information

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Dashon Hines &lt;dashonhines@gmail.com&gt;

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**Message from McDonald's USA**

1 message

**McDonalds Customer Care** <uscare@ext.mcdonalds.com>

Wed, May 3, 2023 at 10:31 AM

To: "dashonhines@gmail.com" &lt;dashonhines@gmail.com&gt;



Hi Dashon,

Thank you for contacting McDonald's U.S. Customer Care.

The Contact Us form, located on McDonalds.com, is strictly for customer inquiries and feedback. For employee related support, please speak with your local Operator organization or by contacting the McDonald's Service Center toll-free at 1-877-623-1955.

We hope to have the opportunity of serving you again soon under the Golden Arches.

Sincerely,

Eugene  
McDonald's Customer Care

**Case Number: 26661510**

thread::G9Gje501lrW\_qdCs3aUgBCs::

[Click here regarding Telephone Scam Involving the U.S. District Court's Identification](#)

**Filing Procedures for Highly Sensitive Documents-** Do not upload Highly Sensitive Documents (HSD) to ECF. Review Standing Order 21-01 for the Court's procedures and the types of documents that meet the definition of HSDs. Most HSDs are filed under seal as preliminary documents in criminal cases. For other information, [Click Here](#).

Welcome to the official website of the United States District Court for the District of New Jersey.



## Court Locations

### Camden

**Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101  
856-757-5021**

### Newark

**Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102  
973-645-3730**

### Trenton

**Clarkson S. Fisher Building  
& U.S. Courthouse**

**402 East State Street**  
**Trenton, NJ 08608**  
**609-989-2065**

## Other Resources

- **ECF RSS *Add this link to your favorite RSS Reader***
- **Your Employment Rights and How to Report Wrongful Conduct**

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**Online Payments for Criminal Debt**

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**Next Gen ECF**

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**CM/ECF Information**

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**Social Security Appeals**

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**Pro Bono**

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**Career Opportunities**

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**COVID-19 Procedures**

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## Other Court Links

- **Court of Appeals for the Third Circuit**
- **NJ Bankruptcy Court**
- **NJ Pretrial Services**
- **NJ Probation**
- **NJ Historical Society**

## News & Announcements

**Monitor the links on the top of NJD Home page for Court Operation Changes due to COVID**

**Standing Order 2023-02: Amendment/Recission of COVID-19 Procedures in Standing Orders 2021-11 and 2022-02**

**View the PDF attached below: [More »](#)**

**Notice to the Bar: Appointment of Melissa E. Rhoads, Clerk of Court**

**Notice: Requests for Quotes - Carpet**

**Attached below are the requests PDFs: [More »](#)**

**Notice to the Bar: Appointment of Magistrate Judge Day**

**View all »**

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